

UNITED STATES DISTRICT COURT

for the
Eastern District of California**FILED****Aug 07, 2024**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIAIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Three electronic devices seized from
Darrell Daniel on July 23, 2024

Case No. 2:24-sw-0772 CKD

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A.

located in the EASTERN District of CALIFORNIA, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(a)(1)(A)	Unlawful Dealing in Firearms
18 U.S.C. § 371	Conspiracy to Unlawfully Deal in Firearms
21 U.S.C. § 846	Conspiracy to Distribute a Controlled Substance

The application is based on these facts:

See Affidavit of Postal Inspector Jason Bauwens

- ☒ Continued on the attached sheet.
☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/

Applicant's signature

Postal Inspector Jason Bauwens

Printed name and title

Sworn to before me telephonically and signed

Date: August 7, 2024 at 10:14 am*Judge's signature*City and state: Sacramento, California

Hon. Carolyn K. Delaney, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT OF POSTAL INSPECTOR JASON BAUWENS

I, Postal Inspector Jason Bauwens, being duly sworn, hereby depose and state as follows:

PURPOSE

1. This Affidavit is made in support of a search warrant for three electronic devices seized from Darrell Daniel on July 23, 2024, as further described in Attachment A.
2. I assert that there is probable cause to believe that the items described above contain evidence of criminal violations of 18 U.S.C. § 922(a)(1)(A) (unlawful dealing in firearms), 18 U.S.C. § 922(a)(5) (unlawful transfer of firearms across state lines), 18 U.S.C. § 371 (conspiracy to unlawfully deal in firearms), 21 U.S.C. § 841(a)(1) (manufacturing, possessing, and distributing controlled substances), 21 U.S.C. § 843 (illegal use of the mails in furtherance of drug trafficking), and 21 U.S.C. § 846 (drug conspiracy).

AGENT BACKGROUND

3. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS"). I am currently assigned to the Sacramento, California field office. My responsibilities include investigating criminal violations of federal and state law, including illegal narcotics, firearms and illicit proceeds being sent through the U.S. Mail; money laundering; robbery and burglary of postal employees and facilities; destruction of government property; theft/possession of stolen U.S. Mail; mail and bank fraud; and identity theft crimes.
4. I have been employed as a federal law enforcement officer for over 20 years, during which I have graduated from several federal training academies. In 1998, I graduated from the National Park Service Law Enforcement Academy in Sylva, North Carolina, which was a 10-week police academy. In 2003, I graduated from the National Park Ranger Integrated Police Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, which was a 16-week police academy. Most recently, I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, which was a 12-week academy. Throughout my career, I have investigated over 1,000 cases

involving criminal violations of federal, state, and tribal laws. I have conducted narcotics and firearms investigations for over 10 years and have instructed hundreds of hours of training related to the detection, identification, and investigation of narcotics trafficking. I have testified in various federal and state court proceedings. I have participated in multiple Title III wire intercepts regarding narcotics and firearms trafficking investigations and have worked with numerous confidential sources.

5. During my training, experience, and interaction with other experienced Postal Inspectors, Task Force Officers, and other drug and firearm trafficking investigators, I have become familiar with the methods employed by drug and firearm traffickers to smuggle, safeguard, store, transport, and distribute drugs and firearms; to collect and conceal drug and firearm-related proceeds; and to communicate with other participants to accomplish such objectives. I have received specialized training and instruction in narcotics and firearm investigation matters including interdiction, detection, money laundering techniques and schemes, and drug and firearm identification. I have participated in and have been the lead investigator of numerous investigations targeting individuals and organizations trafficking marijuana, methamphetamine, heroin, cocaine, LSD, steroids, and other controlled substances, along with proceeds derived from the sales of narcotics. I have led and participated in numerous investigations targeting individuals trafficking firearms, and proceeds derived from the sales of firearms, via the US Mail. I have investigated many drug traffickers and money launderers who utilize the dark web, encrypted message applications, cryptocurrencies, and various other concealing platforms in furtherance of their criminal enterprise. During the course of these investigations, I have become familiar with the manner in which drug and firearm traffickers conduct their illegal operations. I have written many search, seizure, and arrest warrants related to drug and firearms trafficking investigations, drug proceeds investigations, and drug and firearm parcel interdiction.
6. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.
7. Where I describe statements made by other people (including other law enforcement officers), information contained in reports and/or other

documents or records in this affidavit, that information is described in sum, substance, and relevant part.

8. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

STATEMENT OF PROBABLE CAUSE

Darrell Daniel charged with firearms trafficking.

9. On July 19, 2024, Darrell Daniel was charged by criminal complaint with unlawful dealing in firearms, in violation of 18 U.S.C. § 922(a)(1)(A). 2:24-MJ-0089-CKD. The affidavit in support of the criminal complaint is attached as Attachment C and hereby incorporated by reference.

Daniel arrested in Oklahoma and three electronic devices seized.

10. On July 23, 2024, investigators established surveillance at Daniel's residence at 11 SW 50th Street in Lawton, Oklahoma for the purpose of executing a federal search warrant. At approximately 12:50 p.m., Daniel and his girlfriend Isabel Hernandez departed the residence in Daniel's Chrysler 300. Daniel is the registered owner of the Chrysler 300. Law enforcement initiated a traffic stop on the vehicle for the purpose of executing the pending arrest warrant on Daniel. Daniel was arrested and taken into custody without incident.
11. During the traffic stop, law enforcement seized one black Apple iPhone with a clear case that contained a cherry pattern on it, which was in the hand of Hernandez and one black Apple iPhone with a black and white patterned case that was on Daniel's person.
12. Following the arrest of Daniel, law enforcement executed the federal search warrant at their residence. During the search, law enforcement located and seized one Glock firearm, multiple firearm magazines, and over 200 rounds of ammunition from the bedroom belonging to Daniel and Hernandez. In addition, during the search of their bedroom, law enforcement located and seized one black HP Laptop bearing serial number SCD038JK. While the

laptop was in the open position, Daniel's name was observed on the home screen.

**ELECTRONIC STORAGE,
AND FORENSIC ANALYSIS**

13. As described in Attachment B, this application seeks permission to search for items in data from electronic storage devices. The warrant applied for would authorize the seizure of electronic storage media, electronically stored information from that storage media, and potentially, the copying of electronically stored information from that storage media, all under Rule 41(e)(2)(B).
14. *Forensic Evidence.* As further described in Attachment B, this application seeks permission to locate not only files that might serve as direct evidence of the crimes described in the warrant, but also for forensic electronic evidence that establishes how the storage device was used, the purpose of its use, who used it, when it was used, and/or where it was used.
15. Information stored within a computer and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of criminal conduct under investigation, thus enabling the United States to establish and prove each element, or alternatively, to exclude the innocent from further suspicion. Information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer or storage media. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculpatory or exculpatory the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contain information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows

investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information that can indicate when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user's state of mind as it relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., internet searches indicating criminal planning), or consciousness of guilt (e.g., running a "wiping" program to destroy evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

16. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
17. Further, in finding evidence of how a computer was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.
18. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or

otherwise copying the electronic storage devices and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer assisted scans of the entire medium, that might expose many parts of the internal memory to human inspection in order to determine whether it is evidence described by the warrant.

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CONCLUSION

19. Based on the above information there is probable cause to believe that the electronic storage devices seized from Daniel and Hernandez (as further identified in Attachment A) will have evidence of Daniel's violations of 18 U.S.C. § 922(a)(1)(A) (unlawful dealing in firearms), 18 U.S.C. § 922(a)(5) (unlawful transfer of firearms across state lines), 18 U.S.C. § 371 (conspiracy to unlawfully deal in firearms), 21 U.S.C. § 841(a)(1) (manufacturing, possessing, and distributing controlled substances), 21 U.S.C. § 843 (illegal use of the mails in furtherance of drug trafficking), and 21 U.S.C. § 846 (drug conspiracy). I hereby request that a search warrant be issued for the electronic storage devices identified in Attachment A for the items described in Attachment B.

I swear, under the penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

/s/
JASON BAUWEMS
Postal Inspector

Sworn and Subscribed to me telephonically,
on August 7, 2024,

Hon. CAROLYN K. DELANEY
United States Magistrate Judge

Approved as to form:



JUSTIN LEE
Assistant United States Attorney

ATTACHMENT A

Location to be searched

The two Apple iPhone cellular telephones seized from Darrell Daniel's Chrysler 300 on July 23, 2024, and one black HP laptop bearing serial number SCD038JK seized from Darrell Daniel's residence on July 23, 2024.

All three electronic storage devices are in the custody of the Postal Inspection Service in the Eastern District of California.

ATTACHMENT B

Items to be seized

This search warrant grants authority to seize all evidence of violations of 18 U.S.C. § 922(a)(1)(A) (unlawful dealing in firearms), 18 U.S.C. § 922(a)(5) (unlawful transfer of firearms across state lines), 18 U.S.C. § 371 (conspiracy to unlawfully deal in firearms), 21 U.S.C. § 841(a)(1) (manufacturing, possessing, and distributing controlled substances), 21 U.S.C. § 843 (illegal use of the mails in furtherance of drug trafficking), and 21 U.S.C. § 846 (drug conspiracy), including all of the items set forth below:

1. Any and all names, words, telephone numbers, email addresses, time/date information, messages or other electronic data in the memory of the mobile telephones or on a server and associated with the mobile telephones, including:
 - a. Incoming call history;
 - b. Outgoing call history;
 - c. Missed call history;
 - d. Outgoing text messages;
 - e. Incoming text messages;
 - f. Draft text messages;
 - g. Telephone book;
 - h. Data screen or file identifying the telephone number associated with the mobile telephone searched;
 - i. Data screen, file, or writing containing serial numbers or other information to identify the mobile telephone searched;
 - j. Voicemail;
 - k. User-entered messages (such as to-do lists); and
 - l. Stored media such as photographs, video, or audio recordings.
2. Any passwords used to access the electronic data described above.
3. Any photographs or video depicting firearms, ammunition, firearm accessories, or controlled substances.
4. Any records, communications, or writing related to the acquisition or disposition of firearms, ammunition, firearm accessories, or controlled substances.

5. Any and all locations, addresses, GPS coordinates, names, time/date information, or other electronic data related to addresses and driving directions.
6. Any records related to the shipment of items using the United States Mail or other common carrier.
7. Any financial records.
8. Evidence of user attribution showing who used or owned the devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history.

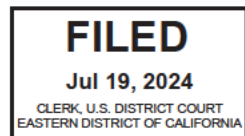
As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

Attachment C

Affidavit in Support of Criminal Complaint

2:24-MJ-0089-CKD

UNITED STATES DISTRICT COURT
for the
Eastern District of California



SEALED

United States of America
v.

Darrell Daniel

Case No.

2:24-mj-0089 CKD

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan. 2021 - July 2024 in the county of Stanislaus in the
Eastern District of California, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 922(a)(1)(A)

Unlawful Dealing in Firearms

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT OF Postal Inspector Jason Bauwens

☒ Continued on the attached sheet.

/s/

Complainant's signature

Jason Bauwens, Postal Inspector

Printed name and title

Sworn to and signed before me telephonically.

Date: 07/19/2024

Judge's signature

City and state: Sacramento, California

Carolyn K. Delaney United States Magistrate Judge
Printed name and title

AFFIDAVIT OF POSTAL INSPECTOR JASON BAUWENS

I, Postal Inspector Jason Bauwens, being duly sworn, hereby depose and state as follows:

PURPOSE

1. This Affidavit is made in support of a criminal complaint and arrest warrant for **DARRELL DANIEL**:

COUNT ONE: Unlawful Dealing in Firearms, in violation of 18 U.S.C. § 922(a)(1)(A).

AGENT BACKGROUND

2. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS"). I am currently assigned to the Sacramento, California field office. My responsibilities include investigating criminal violations of federal and state law, including illegal narcotics, firearms and illicit proceeds being sent through the U.S. Mail; money laundering; robbery and burglary of postal employees and facilities; destruction of government property; theft/possession of stolen U.S. Mail; mail and bank fraud; and identity theft crimes.
3. I have been employed as a federal law enforcement officer for over 20 years, during which I have graduated from several federal training academies. In 1998, I graduated from the National Park Service Law Enforcement Academy in Sylva, North Carolina, which was a 10-week police academy. In 2003, I graduated from the National Park Ranger Integrated Police Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, which was a 16-week police academy. Most recently, I graduated from the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia, which was a 12-week academy. Throughout my career, I have investigated over 1,000 cases involving criminal violations of federal, state, and tribal laws. I have conducted narcotics and firearms investigations for over 10 years and have instructed hundreds of hours of training related to the detection, identification, and investigation of narcotics trafficking. I have testified in various federal and state court proceedings. I have participated in multiple

Title III wire intercepts regarding narcotics and firearms trafficking investigations and have worked with numerous confidential sources.

4. During my training, experience, and interaction with other experienced Postal Inspectors, Task Force Officers, and other drug and firearm trafficking investigators, I have become familiar with the methods employed by drug and firearm traffickers to smuggle, safeguard, store, transport, and distribute drugs and firearms; to collect and conceal drug and firearm-related proceeds; and to communicate with other participants to accomplish such objectives. I have received specialized training and instruction in narcotics and firearm investigation matters including interdiction, detection, money laundering techniques and schemes, and drug and firearm identification. I have participated in and have been the lead investigator of numerous investigations targeting individuals and organizations trafficking marijuana, methamphetamine, heroin, cocaine, LSD, steroids, and other controlled substances, along with proceeds derived from the sales of narcotics. I have led and participated in numerous investigations targeting individuals trafficking firearms, and proceeds derived from the sales of firearms, via the US Mail. I have investigated many drug traffickers and money launderers who utilize the dark web, encrypted message applications, cryptocurrencies, and various other concealing platforms in furtherance of their criminal enterprise. During the course of these investigations, I have become familiar with the manner in which drug and firearm traffickers conduct their illegal operations. I have written many search, seizure, and arrest warrants related to drug and firearms trafficking investigations, drug proceeds investigations, and drug and firearm parcel interdiction.
5. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), in that I am an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516.
6. Where I describe statements made by other people (including other law enforcement officers), information contained in reports and/or other documents or records in this affidavit, that information is described in sum, substance, and relevant part. Where I insert images below, they are screen captures pertaining to the incident or evidence being described. Where I quote jail calls below, they are a verbatim, or near verbatim quote of what was said by the speaker.

7. This affidavit is intended to show that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

STATEMENT OF PROBABLE CAUSE

8. Between January 2021 and July 2024, law enforcement in California and Oklahoma have been investigating Darrell Daniel (“Daniel”) and Isabel Hernandez (“Hernandez”). As discussed below, I believe that Daniel is the leader of a firearm and drug trafficking operation that acquires firearms in Oklahoma and then ships them to California for further distribution and acquires marijuana in California and then ships it to Oklahoma for further distribution. Hernandez lives with Daniel and appears to aid and abet Daniel’s criminal activity, including creating accounts that are used to facilitate the drug and firearms trafficking operation.

Seizure #1 - Modesto, CA - 4 Firearms

9. In January 2021, while conducting a routine parcel profiling operation, United States Postal Inspectors in Sacramento, California identified and intercepted a parcel mailed from the Duncan, Oklahoma post office destined to an address in Modesto, California, which is located in the Eastern District of California. The parcel bore a return address of “Frank White, 108 North D Street, Duncan, OK 73533.” I conducted a database check using Thomson Reuters CLEAR and determined that there was no person using this name associated with this address. CLEAR is proprietary database that collects records from a variety of sources (e.g. utility records, bank, and cell phone records) and is utilized by law enforcement to research people and addresses. I have used CLEAR throughout my time as a law enforcement officer and have found it to be reliable.
10. Following the issuance of a federal search warrant for the parcel in the Eastern District of California (2:21-SW-0043-KJN), Inspectors seized four Glock handguns, along with numerous firearm magazines, from the parcel.

USPS Database and Records Checks

11. Based on the parcel seizure, Sacramento Inspectors conducted numerous checks of USPS records and databases and observed a large number of similar parcels related to the seized parcel, were being shipped to additional addresses within the Eastern District of California. Specifically, the parcels were being shipped from multiple Oklahoma post offices in the rural towns of Duncan, Ada, Lawton, Marlow, Lindsay, Davis, and Minco. The parcels typically weighed between two and fifteen pounds, were shipped using USPS Express or Priority Mail service, contained handwritten labels with varying fictitious sender names or addresses and the transactions were conducted utilizing cash. Based on the records review, Inspectors identified over two dozen similar parcels suspected of containing firearms, firearm accessories and ammunition, shipped by the Oklahoma suspects between June 2020 and January 2021.
12. Additionally, Sacramento Inspectors observed during a check of the USPS shipping and telecommunication records, the same person conducting tracking inquiries of the suspicious mailings leaving Oklahoma, were also tracking a large number of suspicious parcels that were leaving California and being delivered to multiple addresses in Duncan, Oklahoma. The suspicious parcels were being shipped from the same California cities that were receiving the suspected firearms parcels from Oklahoma. The suspicious parcels were consistent with parcels containing narcotics and/or illicit proceeds, weighed between one and twelve pounds, were shipped using USPS Express or Priority Mail service, contained handwritten labels and the transactions were typically conducted utilizing cash. Based on the records review, Inspectors identified over twenty similar related parcels suspected of containing narcotics and/or illicit proceeds, shipped from the Eastern District of California to Oklahoma between March 2020 and January 2021.
13. I am aware based on my training and experience, that the Eastern District of California is a source location for multiple types of narcotics and that those narcotics are often shipped via the US Mail and via other mail services, to other locations throughout the United States, to include the State of Oklahoma. I am also aware that persons receiving narcotics throughout the United States, will often ship payments for the narcotics via the US Mail back to California, including within the Eastern District of California. The payments for the purchased narcotics that are shipped via the US Mail, will often be in the form of cash, money orders or firearms. I am also aware based on my training and experience, that persons residing in California who are

engaged in criminal activity, often receive firearms that were purchased in other states, to include the State of Oklahoma, in an effort to obtain the firearms without going through the proper background checks required in California.

Cable One Inc. Internet Service Provider

14. During USPS telecommunications records checks, your affiant observed a single Internet Protocol (“IP”) Address, which belonged to Internet Service Provider (“ISP”) Cable One Inc., was often conducting online tracking inquiries of the January seized parcel that contained the four firearms (Seizure #1). Additionally, the same IP Address was tracking over two dozen of the other identified suspicious parcels being shipped from California to Oklahoma and Oklahoma to California. Furthermore, during my database checks, I observed the same Cable One IP Address was captured when a customer created their USPS account in November 2020. The following are the details of the customer registered USPS account:

a. USPS Account 1

Username: isanastyy

Name: Isabel Hernandez

Address: 7 N I St, Duncan, OK 73533-6847

Phone: (580) 560-0112

Email: ihern14@yahoo.com

15. In addition to the above account, I located a second USPS customer created account utilizing the same email address, but with a different name, which according to a search of Thomson Reuters CLEAR, appeared to be fictitious. The following are the details of the second customer registered USPS account:

a. USPS Account 2

Username: mrlewis580

Name: Jim Lewis

Address: 1820 W Chisholm Dr , Duncan, OK 73533-1708

Phone: (580) 786-8151

Email: ihern14@yahoo.com

16. Following the USPS records research, I conducted checks of the Thomson Reuters CLEAR database, on the identified Oklahoma addresses which were regularly receiving the suspicious parcels from California, along with the addresses from the USPS customer accounts: 7 North I Street, Duncan, OK

73533; 170436 N 2740 Road, Duncan, OK 73533; and 1820 W Chisholm Dr Duncan, OK 73533. During the CLEAR checks, I identified multiple persons associated with the addresses that had ties to the Duncan addresses, as well as to multiple of the California cities receiving the suspicious parcels from Oklahoma. The people were identified as Darrell Anthony Daniel, Isabel Hernandez, and Isaiah Jamal Daniel.

Oklahoma Suspect and Vehicle Identifications

17. Around the time of the parcel seizure, your affiant contacted United States Postal Inspector Brian Hess in Oklahoma regarding the initial findings of the investigation. Inspector Hess agreed to assist and verified that none of the US Post Offices in the previously mentioned rural towns of Oklahoma where the packages were being shipped from, have working surveillance camera systems, so no images will exist of the persons mailing the parcels. Inspector Hess additionally contacted the USPS Supervisor of Customer Services (“SCS”) located at the Duncan, Oklahoma Post Office and began describing the suspicious parcels in question with him. The USPS SCS immediately advised he was already aware of the customers that mail the suspicious parcels that Inspector Hess was referring to. The USPS SCS stated the parcels are mailed more than one time a week and are typically mailed by a tall, thin black male in his 20s, but on occasion, also by a white or Hispanic female in her 20s, that is slightly overweight, with dark brown hair, and approximately 5'2" tall. The USPS SCS stated the two customers mail a large volume of Priority and Express parcels destined for California, pay for the transactions in cash and the parcels often use the fictitious sender address of “108 North D Street Duncan Oklahoma,” even though it sometimes changes. Inspector Hess requested the USPS SCS to notify him of future mailings by the subjects and to make an attempt to observe what kind of vehicle the subjects arrive in the next time they mail the suspicious parcels.
18. On January 22, 2021, law enforcement conducted surveillance in the vicinity of 7 North I Street, Duncan, Oklahoma. Inspector Hess specifically observed the delivery of a three-pound parcel that was shipped out of Stockton, California and delivered onto the front porch of the residence. During the surveillance, Inspector Hess observed a Maroon Kia sedan (OK LP # KPA208) being driven by an unknown male, arrive, enter into the residence, remove numerous items from the residence and place them into the Maroon Kia

before departing. Agents covertly followed the Maroon Kia and observed it making numerous stops before the surveillance was discontinued.

19. On January 26, 2021, the USPS SCS notified Inspector Hess that the same black male subject previously discussed, came into the Duncan post office and again mailed a Priority Mail parcel destined to an address in Modesto, California (which I confirmed by the tracking number to be the same Modesto address from the previous seizure) and an Express Mail parcel to an address in Brockton, Massachusetts (which later in February was the same address three firearms were seized going to and referenced below as Seizure #2). The USPS SCS observed the male subject arrived and departed the post office driving a “Burgandy Kia sedan.”
20. On January 26, 2021, your affiant reviewed records provided by the internet service provider Cable One Inc., regarding the previously identified IP Address that was tracking Seizure #1 which contained the firearms, along with the other suspicious parcels. As a result, I observed the customer subscriber information for the IP Address was Isabel Hernandez.

Rifle Case Identified Inside Oklahoma Parcel

21. On January 28, 2021, while conducting routine profiling at the USPS West Sacramento Processing and Distribution Center, located in the Eastern District of California, USPIS Task Force Officer (“TFO”) Moranz observed a parcel that was partially broken open, which contained what he recognized to be a plastic rifle case inside the parcel. TFO Moranz advised based on his training and experience, the length of the parcel and the size and shape of the plastic rifle case he could see inside appeared to be consistent with the type and length used to ship an assault rifle with a shortened stock or barrel. As TFO Moranz was familiar with the previous firearm seizure out of Oklahoma, he took two photos of the parcel and but allowed it to continue through the US Mail. TFO Moranz forwarded the photos to your affiant for later review. Based on the parcel photos, your affiant observed the parcel was similar to the other suspicious parcels observed in this investigation. The parcel was mailed from the Marlow, Oklahoma post office, was shipped via Express Mail, and contained a handwritten label that was destined to the same Modesto address as the previous gun seizure. The parcel bore the fictitious sender name and address of “Susan Smith 108 S. First Street Marlow OK. 73055.”

Seizure # 2 - Brockton, Ma - 3 Firearms

22. In February 2021 as a part of this ongoing investigation, your affiant identified a suspicious parcel that was mailed out of the Davis, Oklahoma post office, destined to an address in Brockton, Massachusetts. The Brockton, MA address was the same residential address as that from the identified black male subject driving the Kia sedan during the January 26th mailings. At the request of your affiant, Inspectors in Massachusetts intercepted the parcel. The USPS Priority Mail parcel bore the fictitious sender name and address "Josh Davis 108 First St Marlow, Ok 73055" and was paid for utilizing cash. Following the issuance of a federal search warrant for the parcel in the District of Massachusetts (21-MJ-2054-MBB), Inspectors seized two Glock handguns and one Springfield handgun, along with ammunition and multiple extra capacity magazines.

Surveillance - Darrell Daniel Positively Identified

23. On March 4, 2021, in support of the ongoing investigation, law enforcement in Oklahoma conducted surveillance at multiple locations in Duncan, Oklahoma, to include the 7 North I Street address. At approximately 10:31 a.m., law enforcement observed the previously identified Maroon Kia sedan bearing OK LP# KPA208 back out of the garage of the 7 North I Street address and depart the area. Law enforcement initiated mobile surveillance on the Maroon Kia and followed it as it made several stops. At approximately 12:54 p.m., law enforcement initiated a traffic stop on the vehicle for an Oklahoma traffic violation. During the traffic stop, the driver of the Maroon Kia was identified by his Oklahoma Driver's License as Darrell Daniel, along with a male passenger. Daniel was born in 1994, and is a thin black male, approximately 6'3" tall and 150 pounds.

Seizure #3 - Modesto, CA - 1 Firearm

24. On March 9, 2021, a USPS mail handling clerk was processing parcels at a Modesto, California post office, located in the Eastern District of California, when he picked up a parcel that had broken open and he observed a firearm and case had fallen out of the parcel. Your affiant responded to the post office report and took custody of the parcel and associated contents. The parcel was

determined to contain one Springfield handgun and multiple magazines. During a review of the parcel, your affiant determined the parcel was mailed from a post office located in Lawton, Oklahoma. The parcel bore the fictitious sender name and address “Jacob Smith 108 S. First St. Marlow Ok. 73055” and was paid for utilizing cash. A later check of USPS telecommunications records determined the same Cable One IP Address made numerous tracking inquiries on this seized parcel as well.

Seizure #4 - Tulare, CA - 1 Firearm

25. In May 2021 as a part of this ongoing investigation, your affiant identified a suspicious parcel that was mailed out of the Duncan, Oklahoma post office destined to an address in Tulare, California, which is located in the Eastern District of California. At the request of your affiant, Inspectors in Tulare, California intercepted the parcel. The USPS Priority Mail parcel was similar to the previously identified parcels, was paid for utilizing cash and bore the fictitious sender name and address “Samuel Johnson, 108 First Street, Marlow, OK 73055.” Following the issuance of a federal search warrant for the parcel in the Eastern District of California (5:21-SW-00050-JLT), Inspectors seized one loaded Taurus .38 special handgun and a box of ammunition. A later check of USPS telecommunications records determined that the same Cable One IP Address made numerous tracking inquiries on this seized parcel.

Seizure #5 - Tulare, CA - 4 Firearms

26. In July 2021 as a part of this ongoing investigation, your affiant identified two additional parcels mailed from Oklahoma that were destined to the same Tulare, California address associated with the May firearm seizure. The two parcels contained similar parcel characteristics as the other parcels in this investigation and were mailed out of the Lawton and Marlow Oklahoma post offices. The writing on the two parcels appeared to be from the same person, yet the parcels were shipped from two separate nearby post offices on the same day. The sender addresses on the parcels were written as “508 NW Arlington Ave Lawton Ok 73507” and “710 W Wade St Marlow Ok 73055.” Neither parcel bore any sender or recipient names. At the request of your affiant, Inspectors in Tulare, California intercepted the two parcels. On July 30, 2021, following the issuance of a federal search warrant for the two parcels in the Eastern District of California (5:21-SW-00074-JLT), Inspectors seized

four Glock handguns, numerous magazines and a small amount of ammunition. A later check of USPS telecommunications records determined the same Cable One IP Address tracking the previous seizures, again made numerous tracking inquiries on one of the two seized parcels.

USPS Customer Service Center Calls

27. In addition to the IP tracking inquiries on the parcel, I conducted a check of USPS records and observed on July 31, 2021, a customer called into the USPS Customer Service Center regarding one of the Seizure #5 firearm parcels. The number the customer called in from was logged as (580) 786-8151. During the recorded phone call, in summary, the male customer verbally identified himself as "Franklin Thomas"¹ and advised he was the mailer of the package in question and was requesting an update on the delivery status of the package as it should have arrived already. The caller stated he was a regular user of the postal service and the last time he mailed a package to this same address in Tulare, California it never got delivered either. The customer provided a call back number of 580-786-6736 and verified the intended recipient address was the same recipient address as that of the May and July firearm seizures.

28. Based on the above phone call, I located two additional calls into the USPS Customer Service Center which originated from the same customer phone number ending in 8151. The two logged phone calls were in October 2020 and the same customer was calling about another missing package, this one destined to the address 170436 N 2740 Road, Duncan, OK 73533. During the two recorded phone calls, in summary the caller stated he was an almost daily user of the USPS and stated he uses the USPS about 15 times a week. Even though the caller called from the same phone number ending in 8151 and the caller's voice appeared to be the same male from the July 2021 recorded phone call, this time the caller stated his name was "Thomas Mellow," instead of "Franklin Thomas."

29. On August 6, 2021, I conducted a search of CLEAR for the two phone numbers associated with the USPS calls. As a result of the search, I observed both phone numbers (ending 8151 and ending 6736) were most recently associated

¹ Note: As discussed above, phone number 580-786-8151 was used to register a USPS account in the name of "Jim Lewis."

with the same Darrell Daniel previously identified who resides at 7 North I Street, Duncan, Oklahoma.

30. In addition to the CLEAR search, on August 11, 2021, I conducted a review of AT&T records associated with the two phone numbers ending 8151 and 6736. As a result of the records review, I observed the customer name subscribed to both phones was Darrell Daniel.

Fingerprint Evidence

31. In August 2021 and again in October 2021, I submitted numerous items of firearms and packaging evidence from the seized items to the USPIS Forensic Laboratory for Latent Fingerprint Development and Analysis. As a result, the laboratory analysis resulted in the following suspect identifications:

DARRELL Daniel:

- 1 fingerprint match on one of the Glock gun boxes from the January 2021 Modesto parcel (Seizure #1);
- 2 fingerprint matches on the inner flaps of the Priority box from the February 2021 Massachusetts parcel (Seizure #2);
- 1 fingerprint match on one Glock gun case from inside the February 2021 Massachusetts parcel (Seizure #2);
- 1 fingerprint match on one of the firearm magazines from inside the February 2021 Massachusetts parcel (Seizure #2);
- 7 fingerprint matches on the inner portion of the Priority box from the May 2021 Tulare parcel (Seizure #4);
- 5 fingerprint matches on the Taurus gun box and Taurus paperwork from the May 2021 Tulare parcel (Seizure #4);

ISABEL Hernandez:

- 3 fingerprint matches on the shipping label and adhesive side of the tape from the January 2021 Modesto parcel (Seizure #1);
- 1 fingerprint match on the adhesive side of the tape on the February 2021 Massachusetts parcel (Seizure #2);
- 2 fingerprint matches on the underside of the shipping label on the February Massachusetts parcel (Seizure #2);

ISAIAH Daniel:

- 1 fingerprint match on a firearm magazine from inside the July 2021 Tulare parcel (Seizure #5);
- 2 fingerprint matches on a plastic bag from inside of a Glock gun case from the July 2021 Tulare parcel (Seizure #5);
- 3 fingerprint matches on the underside of the shipping labels and from the July 2021 Tulare parcels (Seizure #5);
- 3 fingerprint matches on the Priority box from inside the July 2021 Tulare parcel (Seizure #5);

Oklahoma Firearm Trafficking Suspects

32. Based on open-source social media research, Isabel Hernandez and Darrell Daniel reside together and appear to be actively engaged in a romantic relationship. Isaiah Daniel appears to be related to Darrell Daniel.
33. The Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) regulates the licensing of firearms dealers. According to ATF records, none of the subjects of this investigation (Isabel Hernandez, Darrell Daniel, and Isaiah Daniel) have a federal firearms license. Accordingly, it is unlawful for any of the subjects of this investigation to transfer a firearm to a person outside the state of Oklahoma. Pursuant to 18 U.S.C. § 922(a)(5), it is unlawful “for any person [other than a licensed dealer] to transfer, sell, trade, give, or deliver any firearm to any person . . . who the transferor knows or has reasonable cause to believe does not reside in the State in which the transferor resides.”
34. According to a review of his criminal history record, Darrell Daniel is prohibited from possessing a firearm because he has been convicted of the following felony crimes punishable by a term of imprisonment exceeding one year: California Penal Code § 25850(C)(6) - carrying a loaded firearm while not being the registered owner (2016, felony); and Arizona Statute 13-3405A4 - transport, import, sell or to sell marijuana into the State of Arizona (2019, felony).
35. In late 2021 and again in late 2022, I received and reviewed firearms purchase and trace records for Isaiah Daniel. Each firearm purchase record, documented Isaiah Daniel’s birthdate, drivers license number, as well as his address, which was listed as: 170436 N 2740 Road, Duncan, OK 73533. As a result of the records review, I observed that Isaiah Daniel was the purchaser of multiple firearms that were recovered by law enforcement outside the State

of Oklahoma. Furthermore, I also observed Isaiah Daniel made numerous “multiple firearm” purchases, which is defined as two or more handgun purchases made by the same individual within a five-business day period. Based on my training, experience and conversations with other firearms trafficking investigators, I am aware that persons engaged in the unlawful dealing of firearms without a license and who unlawfully transfer firearms to out of State residents without a license, will often purchase a higher than usual number of firearms for the sole purpose of selling them to another person, often times the same make, models and calibers over a short period of time, and some of the firearms will often be recovered by law enforcement in other states, as is the case with Isaiah Daniel’s purchases. Specifically, Isaiah Daniel made the following purchases:

- June 24, 2021: Glock 19X, 9MM
- June 24, 2021: Glock 19X, 9MM
- June 25, 2021: Glock 19X, 9MM
- June 25, 2021: Glock 20GEN4, 10MM
- June 28, 2021: Glock 33, .357 Caliber
- June 28, 2021: Glock 26GEN4, 9MM (Recovered by police in California)
- June 28, 2021: Glock 33, .357 Caliber
- June 28, 2021: Pioneer Arms Corporation Hellup, 7.62x39 Caliber (Recovered by police in California)
- June 29, 2021: Glock 43, 9MM (Recovered by police in Texas)
- July 8, 2021: Glock 26, 9MM (Recovered in Seizure #5 parcel)
- July 8, 2021: Glock 27, 40 Caliber (Recovered in Seizure #5 parcel)
- April 08, 2022: Glock 29, 10MM (Recovered by police in California)

Seizure #6 - Duncan, OK - 1,228 grams of Marijuana

36. In September 2021, as a part of this ongoing investigation, your affiant identified a parcel mailed from Sacramento, California that was destined to an address associated to both Darrell Daniel and Isaiah Daniel, utilizing the fictitious recipient name of “Franklin Miller” and destined to the address of “1820 W Chisholm Drive, Duncan, Oklahoma.” The parcel contained similar parcel characteristics as the other parcels in this investigation which were mailed from California and delivered to the suspect controlled addresses in Oklahoma and suspected of containing narcotics. The parcel was intercepted by Inspectors in Sacramento. On October 19, 2021, following the issuance of a federal search warrant for the parcel in the Eastern District of California (2:21-SW-0805-KJN), Inspectors seized approximately 1,228 grams of field

test positive marijuana. A later check of USPS telecommunications records again determined the Cable One IP Address previously identified belonging to Daniel and Hernandez made numerous online tracking inquiries on the parcel. In addition, the USPS Customer Service Call Center received a phone inquiry regarding the seized parcel. The customer call originated from the previously identified phone number belonging to Daniel which ended in 8151.

Seizure #7 - Oakdale, CA - 3 Firearms

37. In November 2021 as a part of this ongoing investigation, your affiant identified a suspicious parcel that was mailed out of the Marlow, Oklahoma post office destined to an address in Oakdale, California, which is located in the Eastern District of California. US Postal Inspectors in Sacramento intercepted the parcel. The USPS Priority Mail parcel was similar to many of the previously identified parcels, was paid for utilizing cash and bore a fictitious sender name and address in Oklahoma. On November 5, 2021, following the issuance of a federal search warrant for the parcel in the Eastern District of California (2:21-SW-0846-CKD), Inspectors seized the lower receivers for three Glock 9MM and .40 Caliber handguns, along with numerous gun magazines from the parcel. Following the seizure of the parcel, I conducted a check of USPS records and identified a second parcel mailed from Oklahoma the same day as this seized parcel, which was similar to the other parcels seized in this investigation, that was successfully delivered to a different address in Oakdale, California. Based on my training and experience, I am aware that persons involved in trafficking firearms through the US Mail, will often separate the slides and/or barrels of firearms from the lower receivers of the firearms and mail them in separate parcels to separate addresses, in an attempt to avoid detection from law enforcement and minimize the loss of the entire firearms in the case of a law enforcement interdiction. Based on my review of both parcels, I believe the parcel delivered to the other Oakdale address, contained the barrels and slides associated with the three Glock lower receivers that were seized.

Seizure #8 - Oakdale, CA - 3 Firearms

38. In May 2022, again as a part of this ongoing investigation, your affiant identified two more suspicious parcels that were mailed out of the Duncan, Oklahoma post office destined to another address in Oakdale, California. US Postal Inspectors intercepted the parcels. The USPS priority mail parcels

were similar to many of the previously identified parcels, which were paid for utilizing cash, had similar handwriting to the others and bore a similar fictitious sender name and address in Oklahoma. The USPS Priority Mail parcels bore the fictitious sender name and address “Franklin Miller 108 First St Marlow, Ok 73055.” On May 23, 2022, following the issuance of federal search warrants in the Eastern District of California (2:22-SW-0349-JDP and 2:22-SW-0350-JDP) for the two parcels, Inspectors seized one Glock handgun and two Kimber handguns, along with multiple gun magazines from the parcels. A later check of USPS telecommunications records again determined the previously identified Cable One IP Address belonging to Daniel and Hernandez made online tracking inquiries on the seized parcels.

Seizure #9 -Marysville and Pinole, CA - 7 Firearms

39. On February 13, 2024, again as a part of this ongoing investigation, your affiant identified two more suspicious parcels that were mailed from a contract postal unit located in Lawton, Oklahoma, which were destined to two different addresses in Northern California, one in the city of Marysville and one in the city of Pinole. US Postal Inspectors intercepted the parcels. The USPS priority mail parcels were similar to many of the previously identified parcels, which were paid for utilizing cash, had similar handwriting to the others and bore fictitious sender and recipient names. On February 20, 2024, following the issuance of federal search warrants in the Eastern District of California (2:24-SW-0182-JDP and 2:24-SW-0182-JDP) for the two parcels, Inspectors seized seven firearms (5 destined to Pinole and 2 destined to Marysville), two of which were reported stolen, along with multiple gun magazines and ammunition from the parcels.

40. As a part of the investigation into the parcels containing the seven firearms, I contacted Inspector Hess in Oklahoma and notified him of the seized parcels. Inspector Hess travelled to the Lawton contract postal unit where the two seized parcels containing the seven firearms were mailed, to inquire about surveillance video during the time the parcels were mailed. Inspector Hess met with the owner of the business and confirmed there was audio and video surveillance present during the time the two seized parcels containing seven firearms were mailed. Inspector Hess conducted a review of the surveillance video and observed the individual who mailed the parcels containing the seven firearms, matched that of Daniel. Additionally, Daniel arrived and departed

the post office driving a white Chrysler 300, which appeared to be the same vehicle registered to Daniel and observed at his residence.

Seizure #10 - Duncan, Oklahoma - 1,407 grams of Marijuana

41. On March 9, 2024, at two different times during the day, two USPS Priority Mail parcels were mailed from the same Post Office located in Walnut Creek, California. Both parcels were destined to the address, 170436 N 2740 Road, Duncan, Oklahoma, which was known to be associated with Daniel and previously identified in this investigation as receiving suspected narcotics and/or narcotics proceeds parcels from California. The USPS priority mail parcels were similar to many of the previously identified parcels in this investigation. The parcels bore fictitious sender and recipient names and contained handwritten labels with handwriting similar to others mailed by Daniel which were seized by law enforcement. On March 11, 2024, I travelled to the Walnut Creek Post Office and conducted a review of the surveillance video present during the time the parcels were mailed. During the video review, I observed there was only one working camera at the post office at the time of the mailings. The camera did not cover the register where each transaction was conducted at but did cover the view of the customer line near the register. During the review, Daniel was observed entering the post office just before the time of both mailings, carrying boxes that appeared to match the two identified parcels. Inspector Hess intercepted one of the two parcels and following a positive alert on the parcel by a certified drug detection canine, he obtained a federal search warrant for the parcel in the Western District of Oklahoma (24-MJ-220-AMG). On March 12, 2024, following the issuance of the federal search warrant, Inspector Hess seized approximately 1,407 grams of suspected marijuana from the parcel.

Cash App Records

42. Cash App is a mobile payment service developed by Block Inc. that allows users to transfer money to one another using a mobile phone app. Once a user downloads Cash App, they can choose a unique username, which the company calls a "\$cashtag." Additionally, users must enter a phone number or email address. Users can also be located using the phone number or email address tied to their Cash App account. A user can enter their debit card information to link their bank account to their Cash App account. A user may add funds to their Cash App account using a debit card linked to an existing bank

account. A user may transfer funds from their Cash App account to their bank account as well. Cash App offers a free Visa-certified debit card, called a Cash Card, that users can request. This debit card can be used at standard retail locations and ATMs to take out cash. Cash Cards have individual transaction and weekly limits. However, a user can increase those limits by verifying their full name, date of birth and the last four digits of their social security number. A user may verify their Cash App account by uploading a picture of their driver's license. Once an account is verified, the user can increase the amount of money a user can send to another user and receive from another user.

43. In April 2024, your affiant received and began reviewing Cash App account records associated with multiple accounts belonging to Daniel and Hernandez. In each of the Cash App accounts, Daniel and Hernandez uploaded photos of government issued identifications and the accounts contained their true names, date of births, social security numbers, and associated email addresses and phone numbers. During the reviews for the accounts of Daniel, I observed the previously identified and referenced phone numbers in this investigation, 580-560-4721 and 580-786-8151 were both listed on accounts as his contact verification numbers.

44. In addition, during the reviews, I observed between 2018 and April 2024, both Daniel and Hernandez had received a large number of transactions and currency from multiple co-conspirators identified in this investigation believed to be receiving firearms shipments from Daniel and Hernandez. Specifically:

- The verified Cash App account belonging to Co-Conspirator #1 from Modesto, California sent over 25 transactions totaling over \$15,000.00 dollars to the Cash App accounts belonging to Hernandez and sent over 40 transactions totaling over \$20,000.00 dollars to the Cash App accounts belong to Daniel. During this ongoing investigation, I conducted reviews of USPS business records and identified over forty suspicious parcels were mailed from Oklahoma between 2020 and 2024, all of which were delivered to the Modesto, California residence belonging to Co-Conspirator #1, including the previously referenced Seizure #1 and Seizure #3, in which investigators seized five firearms linked to Daniel and Hernandez. Based on my training and experience and knowledge of this ongoing investigation, I believe the Cash App

payments sent from Co-Conspirator #1 to Daniel and Hernandez were payments for firearms and firearms accessories.

- The verified Cash App account belonging to Co-Conspirator #2 from Oakdale, California sent over 10 transactions totaling over \$10,000.00 dollars to the Cash App account belonging to Daniel. During this ongoing investigation, I conducted reviews of USPS business records and identified over ten suspicious parcels were mailed from Oklahoma between 2020 and 2024, which were delivered to Oakdale, California addresses linked to Co-Conspirator #2, including the previously referenced Seizure #8, in which investigators seized three firearms. Based on my training and experience and knowledge of this ongoing investigation, I believe the Cash App payments sent from Co-Conspirator #2 to Daniel were payments for firearms and firearms accessories.
- The verified Cash App accounts belonging to Co-Conspirator #3 from Pinole, California sent over 10 transactions totaling over \$15,000.00 dollars to the Cash App account belonging to Daniel. During this ongoing investigation, I conducted reviews of USPS business records and identified over thirty suspicious parcels were mailed from Oklahoma between 2023 and February 2024, all of which were delivered to two Pinole and San Pablo, California residences belonging to Co-Conspirator #3, including the previously referenced Seizure #9, in which investigators seized five firearms shipped by Daniel to the Co-Conspirator #3's Pinole residence. Based on my training and experience and knowledge of this ongoing investigation, I believe the Cash App payments sent to Daniel from Co-Conspirator #3 were payments for firearms and firearms accessories.

REQUEST FOR SEALING

45. This is an ongoing investigation involving what now appears to be an organization of people involved in drug and firearms trafficking. Disclosing the Application for Criminal Complaint, the Arrest Warrant, and this Affidavit to the public has the potential to alert the subjects to the details of the investigation, motivate them to flee, attempt to influence potential witnesses, and motivate those knowledgeable of illegal activity to destroy evidence. Accordingly, I request that the Court issue an order pursuant to

which the Application for Criminal Complaint, the Arrest Warrant and this Affidavit be filed under seal until further order of this Court.


CONCLUSION

46. Based on the foregoing facts, there is probable cause to believe that Darrell Daniel has violated 18 U.S.C. § 922(a)(1)(A), unlawful dealing in firearms. I hereby request that this Court issue an arrest warrant for Daniel.

I swear, under the penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

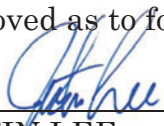
/s/
JASON BAUWENS
Postal Inspector

Sworn and Subscribed to me telephonically,
on July 19, 2024,



Hon. Carolyn K. Delaney
United States Magistrate Judge

Approved as to form:



JUSTIN LEE
Assistant United States Attorney

PENALTY SLIP

United States v. Darrell Daniel

COUNT ONE: 18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing in Firearms

Fine of up to \$250,000, and/or

Imprisonment of up to 5 years, or both

Term of Supervised Release of up to 3 years

Mandatory \$100 Special Assessment

UNITED STATES DISTRICT COURT

for the
Eastern District of California

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

Three electronic devices seized from
Darrell Daniel on July 23, 2024

)
)
) Case No. 2:24-sw-0772 CKD
)
)
)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the EASTERN District of CALIFORNIA
(identify the person or describe the property to be searched and give its location):

See Attachment A.

The person or property to be searched, described above, is believed to conceal (identify the person or describe the property to be seized):

See Attachment B.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property.

YOU ARE COMMANDED to execute this warrant on or before August 21, 2024

(not to exceed 14 days)

☐ in the daytime 6:00 a.m. to 10 p.m. ☒ at any time in the day or night as I find reasonable cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to United States Magistrate Judge
any duty magistrate judge

(name)

☐ I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box) ☐ for _____ days (not to exceed 30).

☐ until, the facts justifying, the later specific date of _____.

Date and time issued: August 7, 2024 at 10:14 am

Judge's signature

City and state: Sacramento, California

Hon. Carolyn K. Delaney, U.S. Magistrate Judge

Printed name and title

Return

Case No.:

Date and time warrant executed:

Copy of warrant and inventory left with:

Inventory made in the presence of :

Inventory of the property taken and name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.

Date: _____

Executing officer's signature

Printed name and title

Subscribed, sworn to, and returned before me this date.

Signature of Judge

Date

